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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MARK YOUNG, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

SOLANA LABS, INC.;
THE SOLANA FOUNDATION;
ANATOLY YAKOVENKO; MULTICOIN
CAPITAL MANAGEMENT LLC; KYLE
SAMANI; and FALCONX LLC,

Defendants.

Case No. 3:22-cv-03912-JD

**DECLARATION OF SUNNY S. SARKIS IN
SUPPORT OF MOTION TO SERVE AS LEAD
PLAINTIFF AND TO APPOINT LEAD
COUNSEL**

1 I, SUNNY S. SARKIS, declare the following:

2 1. I am an attorney duly licensed to practice before all of the courts of the State of
3 California and this Court. I am a member of the law firm Schneider Wallace Cottrell Konecky LLP
4 (“Schneider Wallace”), counsel for proposed lead plaintiff/movant Mark Young. I make this
5 declaration in support of Movant’s Motion for Appointment as Lead Plaintiff and Approval of
6 Selection of Counsel. I have personal knowledge of the matters stated herein and, if called upon, I
7 could and would competently testify thereto. I have personal knowledge of the facts in this
8 declaration. If called as a witness, I would and could competently testify to them.

9 2. Attached hereto are true and correct copies of the following exhibits:

10 a. Exhibit A: Notice of pendency of class action published on PR Newswire, a national
11 business-oriented wire service, on July 6, 2022 (ECF 20 & 20-1);

12 b. Exhibit B: Movant’s Sworn Certification; and

13 c. Exhibit C: Schenider Wallace Firm Resume.

14 3. After graduating from McGeorge School of Law, I worked as a judicial law clerk for
15 two bankruptcy judges in the United States Bankruptcy Court for the Eastern District of California.

16 4. Following my federal bankruptcy clerkships, I joined a large plaintiff-side law firm
17 specializing in prosecuting private federal class actions for violations of the federal securities laws.
18 My representative matters include:

19 • *Hutchinson v. Perez (In re Eastman-Kodak Securities Litigation)*, No. 1:12-cv-01073-
20 HB (S.D.N.Y. Feb. 10, 2012) (Baer, J.);

21 • *In re Celera Corporation Securities Litigation*, No. 5:10-cv-02604-EJD (N.D. Cal.
22 June 17, 2010) (Davila, J.);

23 • *City of Dearborn Heights Act 345 Police & Fire Retirement System v. Align*
24 *Technology, Inc.*, No. 5:12-cv-06039-BLF (N.D. Cal. Nov. 28, 2012) (Freeman, J.);

25 • *Westley et al v. Oclaro, Inc.*, No. 3:11-cv-02448-EMC (N.D. Cal. May 19, 2011)
26 (Chen, J.);

27 • *Thomas v. Magnachip Semiconductor Corp.*, No. 3:14-cv-01160-JST (N.D. Cal. Mar.
28 12, 2014) (Tigar, J.);

- 1 • *Bodri v. GoPro, Inc.*, No. 4:16-cv-00232-JST (N.D. Cal. Jan. 13, 2016) (Tigar, J.);
- 2 • *Steck v. Santander Consumer USA Holdings Inc.*, No. 3:15-cv-02129-K (N.D. Tex.
- 3 June 24, 2015) (Kinkeade, J.);
- 4 • *City of Roseville Employees Retirement System v. Sterling Financial Corporation*,
- 5 No. 2:09-cv-00368-SAB (E.D. Wa. Dec. 11, 2009) (Bastian, J.);
- 6 • *City of Westland Police and Fire Retirement System v. Metlife, Inc.*, No. 1:12-cv-
- 7 00256-LAK (S.D.N.Y. Jan. 12, 2012) (Kaplan, J.); and
- 8 • *City of Sterling Heights General Employees Retirement System v. Prudential*
- 9 *Financial, Inc.*, No. 2:12-cv-05275-MCA-LDW (D.N.J. Aug. 22, 2012) (Wettre, J.).

10 5. I joined Schneider Wallace on or around February 28, 2022.

11 6. At Schneider Wallace, I work primarily in the financial services group, along with my
12 colleagues, Todd M. Schneider, Jason H. Kim, and Matthew S. Weiler, in the Emeryville, California
13 office.

14 7. My colleague, Matthew S. Weiler, has more than fifteen years' experience litigating
15 antitrust, *qui tam*, and securities matters in California state court and federal courts across the U.S.
16 Prior to pursuing his plaintiff-oriented practice, Mr. Weiler represented defendants in securities
17 litigation for ten years. During his time as a defense attorney, Mr. Weiler defended issuers of
18 securities in litigation brought by shareholders under state and federal laws. From January 2015
19 until June 2017 at a prior firm Mr. Weiler was a member of the team that pursued antitrust claims
20 before this Court concerning price-fixing of capacitors, a passive electronic component. Mr.
21 Weiler's responsibilities in the *Capacitors* litigation included drafting opposition to Defendants'
22 motions to dismiss and other key pretrial briefing; conducting depositions of fact witnesses and
23 Defendants' Rule 30(b)(6) designees; developing economic theories that supported damages
24 analysis; and presenting oral argument to this Court.

25 8. At a prior plaintiff-oriented firm, Mr. Weiler had responsibilities in the *In re Twitter*
26 *Securities Litigation*, Case No. 3:16-cv-05314 (N.D. Cal.) related to that firm's role as liaison
27 counsel. The *Twitter Securities* case settled for \$809.5 million. Additionally, Mr. Weiler played a
28 limited role in focusing on the price-fixing allegations that were the basis for the securities laws

1 violations and certain expert work in *In re Teva Securities Litigation*, Case 3:17-cv-00558-SRU
2 (S.D.N.Y.), which settled earlier this year for \$420 million.

3 9. At Schneider Wallace, Mr. Weiler represents firm clients in pursuing claims related to
4 price fixing of generic drug, and other anticompetitive practices in the health care industry that harm
5 health care providers. Mr. Weiler is a key team member in the *Tether* litigation, which concerns
6 claims brought by crypto asset purchasers for market manipulation.

7 I hereby declare and affirm under penalty of perjury that the foregoing is true and correct to the best
8 of my knowledge and recollection.

9 Dated: September 6, 2022

10 Respectfully submitted,

11 /s/ Sunny S. Sarkis

12 Sunny S. Sarkis

13 **SCHNEIDER WALLACE**

14 **COTTRELL KONECKY LLP**